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March 27, 2019

VIA ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Lek Securities Corporation, et al., v. Louis, et al.*,
Case No. 1:19-cv-02142-RMB-BCM

Dear Judge Berman:

Schulte Roth & Zabel LLP is counsel to Defendants Volant Holding, LLC d/b/a Volant Trading, Volant Trading, LLC, Volant Liquidity, LLC, and Volant Execution, LLC (collectively "Volant"). We write respectfully together with Robert S. Landy of Ford O'Brien LLP, counsel to individual defendants Nicolas Louis and Jonathan Fowler (the "Individual Defendants"), pursuant to Your Honor's Individual Rules of Practice to request an extension of all of the defendants' time to answer, move or otherwise respond to plaintiffs' complaint.

This action was initiated by plaintiffs' filing of their complaint and application for a temporary restraining order and preliminary injunction on March 8, 2019. Volant's response to the complaint is currently due on March 29, 2019, and the Individual Defendants' response to the complaint is currently due on April 1, 2019. The defendants request that their time to respond to the complaint be extended and, as of today, have obtained plaintiffs' consent to a seven day extension. We are asking for this extension, in part, to enable the parties to continue to pursue settlement efforts and because of the possibility that the Court's ruling on the application for a preliminary injunction may clarify certain issues and impact the nature of the defendants' response to the complaint. This is the defendants' first request for such an extension. We expect to request an additional modification to the defendants' time to respond to the complaint once we have further opportunity to confer with counsel to the plaintiffs on other scheduling issues.

We thank the Court for its attention to this matter.

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Respectfully Submitted,

/s/ Max Garfield

Max Garfield

cc: Counsel of Record